

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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|--------------------------------|----------|--------------------------|
| In re:                         | §        | Chapter 11               |
|                                | §        |                          |
| AGILON ENERGY HOLDINGS II LLC, | §        | Case No. 21-32156 (MI)   |
| <i>et al.</i> , <sup>1</sup>   | §        |                          |
|                                | Debtors. | § (Jointly Administered) |

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**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL  
NOTICES, PLEADINGS, ORDERS AND OTHER PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel and the law firm of Munsch Hardt Kopf & Harr, P.C. hereby appear on behalf of the Electric Reliability Council of Texas, Inc. (“ERCOT”), a party-in-interest in the bankruptcy case (the “Bankruptcy Case”) of the above-captioned debtors, and pursuant to Section 1109(b) of the Bankruptcy Code and Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure hereby enters this appearance and requests that all notices given or required to be given in the Bankruptcy Case, and all papers served or required to be served in the Bankruptcy Case, be served upon the undersigned counsel at the following address:

Deborah M. Perry  
Munsch Hardt Kopf & Harr, P.C.  
500 N. Akard Street, Suite 3800  
Dallas, Texas 75201-6659  
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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases (the “Bankruptcy Case(s)”), along with the last four digits of their respective Employer Identification Numbers, are as follows: Agilon Energy Holdings II LLC (3389) (“Agilon”), Case No. 21-32156; Victoria Port Power LLC (4894) (“VPP”), Case No. 21-32157; and Victoria City Power LLC (4169) (“VCP” and together with Agilon and VPP, the “Debtors”), Case No. 21-32158. The Debtors’ mailing address is: 5850 San Felipe, Ste 601, Houston, Texas 77057.

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b) and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, the foregoing request includes notices and papers referred to in the Bankruptcy Rules and additionally includes, without limitation, motions, applications, complaints, demands, notices of motions, notices of applications, notices of hearing, petitions, objections, claims, and all other pleadings or requests, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, other commercial carrier, hand-delivery, facsimile, telegraph, telex, e-mail, telephone or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall not be deemed or construed as ERCOT's: (a) waiver of the right to have final orders in non-core matters entered only after de novo review by the United States District Court; (b) waiver of the right to trial by jury in any proceeding to which such right exists in the Bankruptcy Case or in any case, controversy, or proceeding related to the Bankruptcy Case; (c) waiver of the right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (d) waiver of the right to contest jurisdiction or appropriate venue in any related proceeding; or (e) waiver of any other rights, claims, actions, defenses, setoffs or recoupments which ERCOT has or may hereafter obtain, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments ERCOT hereby expressly reserves.

Dated: June 30, 2021

**MUNSCH HARDT KOPF & HARR, P.C.**  
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By: /s/ Deborah M. Perry  
Deborah M. Perry  
Texas Bar No. 24002755

ATTORNEYS FOR THE ELECTRIC RELIABILITY  
COUNCIL OF TEXAS, INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 30th day of June, 2021, she caused a true and correct copy of the foregoing Notice of Appearance to be served electronically on those parties requesting electronic service through the Court's ECF system.

/s/ Deborah M. Perry  
Deborah M. Perry